

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 08 CR 235
)	Honorable Judge Gottschall
MIGUEL OCON,)	
)	
Defendant.)	

AGREED MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE

NOW COMES the Defendant, MIGUEL OCON, by and through his attorney, RACHEL L. ZEBIO, and requests that this Honorable Court modify the conditions of his pre-trial release.

In support of this motion, Defendant states as follows:

1. The Defendant, Miguel Ocon, is currently awaiting trial that is scheduled for September 15, 2008 in the above-captioned case. Mr. Ocon was released on a secured bond in April 2008 and is currently on home detention with electronic monitoring. The conditions of Mr. Ocon's bond did not include obtaining employment.
2. Mr. Ocon has been offered an employment opportunity with Almex Drywall & Construction. Mr. Ocon would be putting up drywall as the primary function of his employment.
3. The owner of Almex Drywall & Construction resides next door to Mr. Ocon and would be supervising Mr. Ocon daily, as Mr. Ocon would ride with him to and from work each day. Mr. Ocon would be working Monday through Saturdays, from 6 a.m. to 7 p.m.
4. There is no objection by the United States Attorney that Mr. Ocon gain employment.

Additionally, Mr. Ocon's pre-trial services officer has no objection.

WHEREFORE, Miguel Ocon requests that this Honorable Court modify the conditions of his pre-trial release to include employment.

Respectfully submitted,

/s/
Rachel L. Zebio

Rachel L. Zebio
Attorney for Defendant Ocon
190 S. LaSalle Street
Suite #520
Chicago, Illinois 60603
312-782-2770